

B 9/1/1925

In The  
Circuit Court, No. 2  
Baltimore City.

WELDON WREN

VS.

MARGARET F. WREN

722 Penna. Ave  
3rd Flr.

Bill for Divorce

- A VINCULO MATRIMONII -

No 24918 B

Mr. Clerk:--

Please file &c.,

*R M Bond*  
~~504 For Plaintiff.~~

ROY S. BOND  
ATTORNEY AT LAW  
220 ST. PAUL PLACE  
BALTIMORE, MD.

FILED 18 January 1925

#  
WELDON WREN

Vs.

MARGARET F. WREN

IN THE

CIRCUIT COURT

NO. 2

BALTIMORE CITY.  
#

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, Weldon Wren, complaining, respectfully says:

FIRST: That he was married to his wife, Margaret F. Wren, in Baltimore City, State of Maryland, on or about the 1st day of July, 1914, with whom he resided until on or about the 16th day of August, 1917.

SECOND: That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

THIRD: That though the conduct of your orator, towards his said wife, Margaret F. Wren, has been kind, affectionate and above reproach, she without just cause or reason, has abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, is deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

FOURTH: That the defendant has on divers days and times since the said marriage, committed the crime of adultery with divers lewd men, whose names will be disclosed on the day of trial, and that the said acts were committed without his procurement, connivance or consent, and that he has not lived nor cohabited with the said defendant since he discovered the same.


FIFTH: That there are no children as issue of  
said marriage.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii,  
from the defendant, Margaret F. Wren,
- b- Such other and further relief as the  
case may require.

May it please your Honor, to grant unto  
your Orator, Weldon Wren, the writ of subpoena, directed  
unto the said defendant, Margaret F. Wren, residing- 722  
Pennsylvania Avenue, commanding her to be and appear in  
this court, in person or by solicitor, on some day certain  
to be therein named, and perform such decree, as may be  
passed in the premises.

As in duty bound, etc.,

  
~~Solicitor for Plaintiff.~~

P384

Ct. Ct. No. 2

~~91~~  
1925

B

Docket No. 34

Wren

vs.

Wren

772 Penn on 3rd

Subpoena to Answer Bill of Complaint

Pro

No. 24918 B  
2

Copy = copied

Filed

Roy S. Bond

1925

Solicitor.

10

Summoned and a copy of the process  
left with the defendant

John. E. Pate  
Sheriff

Fee \$0.80

(Buckey)  
(2/18/25)



EQUITY SUBPOENA

The State of Maryland

To

Margaret F. Krew  
722 Penna Ave  
3rd floor

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law, beginning on the second Monday of March, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Weldon Krew

against you exhibited in the CIRCUIT COURT No. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 12 day of January, 1925

Issued the 18 day of January, in the year 1925

John Pleasant  
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11).

IN THE CIRCUIT COURT NO. 2

OF

BALTIMORE CITY.

*B 91*  
*1925*

WELDON WRENN

VS.

MARGARET WRENN

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

*Davis Evans*  
ATTORNEYS FOR RESPONDENT  
*70 24918 B*  
*3*

J. STEWARD DAVIS  
ATTORNEY AT LAW  
215 SAINT PAUL PLACE  
BALTIMORE, MD.

*By 27. February 1925*

WELDON WRENN : IN THE CIRCUIT COURT NO.2

VS. : OF

MARGARET WRENN : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent, through her attorneys, Davis and Evans, to the above bill exhibited respectfully says:

1. That she admits the allegations as contained in the first paragraph of the bill of complaint.
2. That she admits the allegations as contained in the second paragraph of the bill of complaint.
3. That she denies emphatically the allegations contained in the third paragraph of the bill of complaint.
4. That she denies emphatically the allegations contained in the fourth paragraph of the bill of complaint.
5. That she admits the allegations as contained in the fifth paragraph of the bill of complaint.
6. She avers that the plaintiff himself has been guilty of the crime of adultery and is living in adultery with another woman.
7. Your respondent further states that she is without means to defend this suit and avers that the plaintiff is employed making about thirty dollars per week. She is advised by Counsel that she may petition this Honorable Court that the plaintiff be required to pay her a reasonable amount as counsel fee for her defense and an amount sufficient to support herself during the pendency of this suit.

WHEREFORE your respondent prays:

- (a) That she may be granted counsel fee and alimony pendente lite.
- (b) That the bill be dismissed with costs to the plaintiff.
- (c) Such other and further relief as the Court may decide

*her*  
Margaret Wrenn  
RESPONDENT.  
witness Jamie Thomas — Davis Evans  
ATTORNEYS FOR RESPONDENT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this *25<sup>th</sup>* day of *February* in the year one thousand nine hundred and twenty five, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Margaret Wrenn and made oath in due form of law that the matters and facts in the foregoing answer are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Melen C. Fisher  
NOTARY PUBLIC.



Sum on  
Plaintiff

or  
Roy S. Bond  
Solicitor

B Docket 34  
91

CIRCUIT COURT No. 2

Weldon Wren

vs.

Margaret J. Wren

Order Counsel Fee and Alimony

Pendente Lite

Husband Plaintiff

ORDER

No. 24918 B.

(4)

Copies - Copied

Filed

28 January  
Hecht

1925

Copy of the within Order of Court served on Roy  
S. Bond, Solicitor for Weldon Wren on the  
2nd day of March, 1925 in the presence of Louis Hecht

Fee \$0.50

John P. Potee  
Sherriff

220  
L. Paul

Weldon Wrenn

vs.

Margaret Wrenn

IN THE

CIRCUIT COURT No. 2

OF

BALTIMORE CITY

Jan, TERM, 1925

ORDERED BY THE COURT, this

28

day of

January

1925

that the Plaintiff

Weldon Wrenn

pay to the Defendant

Margaret F. Wrenn

the sum of

twenty-five

Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of

twelve

Dollars per week, during the continuance of this suit, to the said Defendant

Margaret F. Wrenn

as Alimony, pendente lite, unless cause to the contrary be shown on or before the

16

day of

March

1925,

provided a copy of this Order be served on the said Plaintiff

Weldon Wrenn or his solicitor

on or before the

6

day of

March

1925

Robert F. Stanton

TRUE COPY—TEST:

\$35. per week

No children

Clerk.

Circuit Court No. 2

91 —  
192 5 —      Docket 348

---

WELDON WRENN

---

vs.

MARGARET F. WRENN

---

*Says*

Petition for leave to take  
Testimony and Order of  
Court thereon.

No. 24918 B  
6

Filed *3<sup>rd</sup> July*, 192 *SK*

WELDON WRENN

vs.

MARGARET F. WRENN

IN THE  
**Circuit Court No. 2,**  
OF  
BALTIMORE CITY.

**To the Honorable the Judge of the  
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF ~~-----~~Weldon Wrenn,

~~---Plaintiff---~~

in this case, respectfully shows that ~~--he---~~ desire s to take testimony in this case, and respectfully pray s ~~-----~~ that leave be granted ~~--him---~~ to do so before one of the Standing Examiners of this Court.

*Raymond Bond*  
Solicitor for ~~Plaintiff~~

ORDERED, this *3<sup>rd</sup>* day of *July* 192 *2*, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

*Henry Duffey*



Cir. Ct. No. 2.

91  
192 5

Docket No. 343

WELDON WRENN

VS.

MARGARET F. WRENN

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

R. H. Bond  
Solicitor for Plaintiff.

No. 24918 B  
8

Filed 21<sup>st</sup> July 1925

WELDON WRENN

VS.

MARGARET F. WRENN

# In the Circuit Court No. 2 Of Baltimore City.

----- MAY ----- TERM 1925.

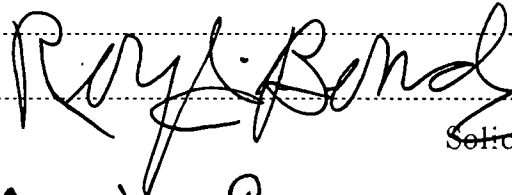
To the Honorable

THE

Judge of the Said Court:

The above cause is respectfully submitted for

decree and the 43rd General Equity Rule is hereby waived.



Solicitor for Plaintiff,

*Davis & Evans*

Solicitor for Defendant.

Ct. Ct. No. 2

91  
192 5

Docket No. 343

WELDON WRENN

vs.

MARGARET F. WRENN

---

**Order of Reference  
and Report**

---

*Lynn*

No. 24918 B.  
9-10

Order Filed 22<sup>nd</sup> day of July 1925

Report Filed 27 day of July 1925

IN THE  
**Circuit Court No. 2**  
OF  
BALTIMORE CITY

WELDON WRENN

vs.

MARGARET F. WRENN

*July* ~~May~~ Term, 1925.

This case being submitted, without argument, it is ordered by the Court, this *22nd* day of *July*, 1925, that the same be and is hereby referred to *L. William P. Lyons*, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

*Walter A. Drayton*

**Report of Auditor and Master**

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of abandonment. Article 16, Sections 36-41.

Defendant summoned and answers.

Plaintiff's residence in Baltimore City for more than two years prior to the filing of the bill proven.

The marriage proven. Abandonment uninterruptedly for three years, its finality and the irreconcilability of the parties proven.

Case submitted for decree and 43rd General Equity Rule waived.

Case ready for decree.

*William P. Lyons*  
Auditor and Master

July 23, 1925



The within is a proper decree  
to be passed in this case.

*William P. Lyons*  
Auditor and Master

Circuit Court No. 2

**B** <sup>91</sup> 1925 No. Docket

WELDON WREN

vs.

MARGARET F. WREN

DECREE OF DIVORCE

*Pd. P.* *R*

No. *24918*

*Copies Copied*

Filed *25<sup>th</sup> July*, 1925

DECREE OF DIVORCE.

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY

WELDON WREN

VS.

MARGARET F. WREN

July Term, 1925

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this 28th day of July, Anno Domini, one thousand nine hundred and twenty-five, by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said WELDON WREN,

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, MARGARET F. WREN.

And it is further Ordered, that the said Complainant, Weldon Wren, pay the cost of this proceeding.

John Pleasants

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 1925

Doc. B 9  
1925

3/19/18

In the Circuit Court, no. 21  
OF BALTIMORE CITY

DEPOSITIONS

Aldon Arew

vs.

Margaret E. Arew

No. 24918B

7  
PLAINTIFF'S COSTS

Examiners..... \$.....

Copies..... ..

Sheriff..... ..

Stenographer..... ..

\$           

DEFENDANT'S COSTS

Examiners..... \$.....

Copies..... ..

Sheriff..... ..

Stenographer..... ..

\$           

July 21<sup>st</sup> 1925

*Meldon Acre*

vs.

*Margaret F Acre*

In the Circuit Court No. 2,

OF BALTIMORE CITY.

*This, above cause being at issue*

and notice having been given me by the Solicitor for the *plaintiff*

of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one of the Standing Examiners of the Circuit Courts of Baltimore City, under and by virtue of an order of the above named Circuit Court, passed in said cause on the *third* day of *July* 19 *25*, met on the *sixth* day of *July* in the year nineteen hundred and *twenty-five* at my office, in the city of Baltimore, in the State of Maryland, and assigned the *seventh* day of *July* in the same year at *one-thirty* o'clock in the *after-*noon and the office of *Royston Bond, Esq.* in the City and State aforesaid, as the time and place for such examination of witnesses in said cause; at which last mentioned time and place I attended, due notice of such meeting having been given, and proceeded in the presence of the Solicitor..... of the *plaintiff*..... to take the following depositions, that is to say:—



407-819  
8.3.25

WELDON WREN

vs.

MARGARET F. WREN.

Testimony taken before me, A.  
deRussy Sappington, Examiner, at the offices of  
Roy S. Bond, Baltimore, Maryland on July 7,  
1925, at 1.30 o'clock in the afternoon.

-----

Thereupon---

WELDON WREN,

the plaintiff, of lawful age, produced on his  
own behalf, having been first duly sworn  
according to law, was examined and testified  
as follows:

By the Examiner:

1Q Please state your name, residence  
and occupation?

A Weldon Wren, 654 Dover Street,  
chauffeur.

2Q Do you know the parties to this  
suit?

A Yes, I am the plaintiff and my

wife is the defendant.

By Mr. Bond:

1Q When, where and by whom were you married?

A By a Priest on Biddle Street, Saint Barnabas Church, in Baltimore, on July 1, 1914.

2Q Are you living with your wife now?

A No.

3Q When did you separate?

A August 16, 1917.

4Q State the circumstances under which you separated?

A She put me out.

5Q How did she put you out?

A I went out --- my friend there (indicating) came to my house and stayed a while and asked me to go around his house, and I went and was not one-half hour, and when I came back she jumped up and raised Cain, and started cursing and picked up a coffee pot and slammed it at me, and she said, I want you to go. I didnt pay no attention, and I went in

the front room. She said, "You are going, because if you eat anything from me I am going to poison you, and if you go to sleep I am going to put a burning lamp under your bed.

6Q How many times had she beat you?

A Twice; she had bursted my eye twice and hit me with a glass, and she put me out. She packed my things and opened the front door and got me by the arm and led me to the door and told me there was my clothes, to go and someone else could take my place.

7Q Did you stay as long as you could under the circumstances?

A Yes.

8Q Have you been a resident of the City of Baltimore, State of Maryland for more than two years prior to the time this case started?

A Yes.

9Q Have you been separated uninterruptedly

for more than three years prior to the same time?

A Yes, sir.

10Q How did you treat your wife?

A Fine.

11Q Were you always a kind, affectionate and true husband?

A Yes, sir, and I worked every day.

12Q Did you give her any cause or reason for treating you like she did, and beating you up and putting you out?

A No, sir.

13Q Were her acts her own deliberate and final ones?

A Yes.

14Q Any hope of reconciliation?

A No, sir.

15Q Any children?

A None.

16Q Has she declared her intentions never to live with you any more?

A Yes, sir.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully at large in your answer.

A.---

No Weldon Wren



Thereupon---

CHARLES BOYER,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

1Q Please state your name, residence and occupation?

A Charles Boyer, 911 North Fremont Avenue, Chauffeur

2Q Do you know the parties to this suit?

A Yes.

By Mr. Bond:

1Q Do you remember when the Wrens were married and lived together as husband and wife?

A Yes.

2Q Were they known and recognized in the community as such?

A Yes.

3Q Did you visit them?

A Yes, sir.

4Q Which left the other?

A She put him out on the 16th of August, 1917.

5Q Were you there?

A Yes.

6Q What did she say, in substance?

A When I went in there in the morning---he went in the room and sat down with me, and she went upstairs and got his clothes and packed them in a basket and got him by the arm and put him outside of the door, and made him get out.

7Q Did you hear her curse him and tell him to get out?

A Yes, sir.

8Q Did you see her throw a coffee pot at his head?

A I did.

9Q ~~Was~~ Was there anyone in the world who could stand such treatment any longer?

A I dont think there is.

10Q Have both parties been residents of the City of Baltimore, State of Maryland for

more than two years prior to the time this case started?

A Oh, yes.

11Q Has his conduct been that of a true, kind and affectionate husband towards his wife?

A Yes.

12Q Has his conduct been above reproach in all respects both before and since the separation?

A Yes.

13Q Did he give her any cause or reason for acting in the manner she did towards him?

A No, sir; she just wanted him to do; when he went with me and came in she started.

14Q Have they been separated uninterruptedly for more than three years prior to the time this case started?

A Yes, sir.

15Q Was her actions her own deliberate and final ones?

A Yes.

16Q Any hope of reconciliation?

A No, sir.

17Q Any children?

A No.

-----

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A.---

No

Charles Bayer



Thereupon---

ESTELIA HARRIS,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

1Q Please state your name, residence and occupation?

A Estella Harris, 621 Archer Street, laundress.

2Q Do you know the parties to this suit?

A Yes.

By Mr. Bond:

1Q Do you remember when they lived together as husband and wife?

A Yes.

2Q Did you visit them?

A Yes.

3Q And knew them to be husband and wife?

A Yes.

4Q Which left the other?

A She put him out on August 16, 1917.

Estella Harris.

15Q What did she tell you?

A She told me she had put him  
out.

16Q What else?

A She said she put him out.

17Q Did she say he gave her any  
cause at all for putting him out?

A No.

18Q Have both parties been residents  
of the City of Baltimore, State of Maryland  
for more than two years prior to the time  
this case started?

A Yes.

19Q Has the separation continued  
uninterruptedly for more than three years prior  
to the same time?

A Yes.

20Q What kind of a husband was he?

A A kind and true husband, and a  
faithful husband.

Estella Harris.

12

21Q Any hope of reconciliation?

A No, sir.

22Q Was her actions towards him  
her own deliberate and final ones?

A Yes.

23Q Has she declared her intentions  
to never live with him any more?

A Yes, she did.

24Q Any children?

A No, sir.

----

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A.---

No Estrella Harris

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the.....*Plaintiff* closed the depositions taken in said cause and now return them closed under my hand and seal, on this.....*21st* day of *July* in the year of Our Lord nineteen hundred and.....*Twenty-one* at the City of Baltimore, in the State of Maryland.

*A. de Russy Sappington* (SEAL).  
Examiner.

There are.....*no*.....Exhibits with these depositions, to wit:  
Plaintiff's..... Exhibit.....*/*

Defendant's..... Exhibit.....*/*

*A. de Russy Sappington*  
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the fore-going depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon.....*two* days, on.....*both* of which I was employed by the Plaintiff....., and on.....*none* by the Defendant.....

*A. de Russy Sappington*  
Examiner.